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March 2, 2007

FACSIMILE (337) 267-2399

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re: 7.200' Sand, Reservoir D

Lower 7,200' Sand, Reservoir A

Bay De Chene Field

Lafourche Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWIFT ENERGY OPERATING**, **L.L.C.** for the calling of a public hearing after legal notice, to consider evidence relative to the issuance of orders relating to the above referenced sands and reservoirs pertaining to the following matters:

7,200' Sand, Reservoir D

- 1. To dissolve the existing 7200 RD SUA, previously created by Office of Conservation Order No. 780-H-3, effective October 17, 2006, and simultaneously therewith, to create a revised unit designated 7200 RD SUA, for the exploration for and production of oil and gas in the Bay De Chene Field, Lafourche Parish, Louisiana.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To confirm and continue in effect Swift Energy Operating, L.L.C. as operator of the proposed revised 7200 RD SUA.
- 4. To designate the Swift Energy Operating, L.L.C. BDC UA No. 137 Sidetrack Well as unit well for the proposed revised unit at the location shown on the attached plat.
- 5. Except to the extent herein set forth, to confirm and continue in full force and effect the provisions of Office of Conservation Order No. 780-H-3, effective October 17, 2006, and applicable statewide orders.

6. To consider such other matters as may be pertinent.

The 7,200' Sand, Reservoir D, in the Bay De Chene Field, Lafourche Parish, Louisiana, Louisiana, was previously defined in Office of Conservation Order No. 780-H-3, effective October 17, 2006, and is hereby redefined as being that oil and gas bearing sand encountered between the depths of 8,090 feet and 8,184 feet (electrical log measurements) (true vertical depths of 8,084 feet and 8,178 feet) in the Swift Energy Operating, LLC – VUA No. 137 Well, located in Section 33, Township 19 South, Range 24 East, Lafourche Parish, Louisiana.

Lower 7,200' Sand, Reservoir A

- 1. To create a single drilling and production unit for the exploration for and production of oil and gas from the Lower 7,200' Sand, Reservoir A, in the Bay De Chene Field, Lafourche Parish, Louisiana, said unit designated LWR 7200 RA SUA.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To provide that any wells drilled to the Lower 7,200' Sand, Reservoir A, should be exempt from the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 4. To provide that the Commissioner of Conservation should be authorized to reclassify the Lower 7,200' Sand, Reservoir A, by supplemental order without the necessity of a public hearing should the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
 - 5. To consider such other matters as may be pertinent.

The Lower 7,200' Sand, Reservoir A, in the Bay De Chene Field, is hereby defined as being that oil and gas bearing sand encountered between the depths of 8,276 feet and 8,316 feet (electrical log measurements) (true vertical depths of 8,213 feet and 8,251 feet) in the Swift Energy Operating, LLC -- VUA No. 136 Well, located in Section 33, Township 19 South, Range 24 East, Lafourche Parish, Louisiana

Pursuant to the Rules of Procedure, pre-application notice was given; however, no request for the conference was received. Therefore, the conference tentatively scheduled for March 15, 2007, WILL NOT BE HELD.

Pertinent data, including well logs, may be obtained, AT THE COST OF THE REQUESTING PARTY, from W. H. Robbins & Associates, 302 LaRue France, Lafayette, Louisiana 70508, Telephone No. (337) 232-5004.

Attached hereto and made a part hereof are plats showing the applicant's proposals along with the list of the names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom a copy of this application is being furnished. Pursuant to the Revised Rules of Procedure, such plats (being the same plats attached to the pre-application notice dated February 19, 2007) and list of parties are being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. The plat and/or list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check in the amount of \$1,510.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

LISKOW & LEWIS

RWRjr/df Enclosures

Richard W. Reveis, Jr.

cc: Mr. Richard Hudson, Lafayette District of Office of Conservation cc: Interested Owners, Represented Parties and Interested Parties

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